

Daniel P. Jones, Esq.
Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Telephone: (215) 572-8111
Facsimile: (215) 572-5025

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

| | |
|--|---|
| In Re: Giovanni Abreu Debtors(s) Rafael Abreu (Non-Filing Co-Debtor) | Chapter 13 Case Number: 19-13200-elf |
|--|---|

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

U.S. Bank National Association, not in its individual capacity, but solely as legal title trustee for BCAT 2016-17TT has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362(d) and §1301 in order to proceed with its rights under non-bankruptcy law with regard to the Property, located at 205 W Green St, Reading, PA 19601.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before January 14, 2020, you or your attorney must do all of the following:

(a) file an answer explaining your position with the Clerk's Office located at:

Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

In Philadelphia:

900 Market Street, Suite 400
Philadelphia, PA 19107-4299

In Reading:

400 Washington Street
The Madison Building, Suite 300
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Daniel P. Jones, Esq.
Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Telephone: (215) 572-8111
Facsimile: (215) 572-5025
djones@sterneisenberg.com

and to the Trustee:

Scott F. Waterman
Ch. 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in this motion.
3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on January 23, 2020 at 11:00 Am in Courtroom #1, United States Bankruptcy Court, The Madison Building, Reading, PA 19601.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

STERN & EISENBERG, PC

By: /s/ Daniel P. Jones, Esq.
Daniel P. Jones, Esq.,
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Phone: (215) 572-8111
Fax: (215) 572-5025
Bar Number: 321876
Email: djones@sterneisenberg.com

Date: December 30, 2019